

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

RONALD BAKER, <i>et al</i>,	:	Case No. 1:14-cv-512
	:	
Plaintiffs,	:	Judge Susan J. Dlott
	:	
v.	:	PLAINTIFFS' MOTION FOR
	:	LEAVE TO FILE MEMORANDUM
PORTSMOUTH, OHIO, <i>et al</i>,	:	IN EXCESS OF 20 PAGES IN
	:	SUPPORT OF MOTION OF
Defendants.	:	PLAINTIFFS FOR SUMMARY
	:	JUDGMENT

Now come the Plaintiffs, by and through counsel, and respectfully request leave to exceed the page limitation for support of Plaintiffs' motion as required by the Court's local rules. Specifically, Plaintiffs seek leave to file a Memorandum in support of their Motion for Summary Judgment that is in excess of 20 pages in length. Plaintiffs respectfully request leave from the Court to file this enlarged Motion. And there is good cause for moderately exceeding the page limitation here:

(1) This case features complex claims under the Fourth, Fifth, and Fourteenth Amendment to the United States Constitution, and abundant precedent. To fully and adequately address these, a memorandum in excess of the 20-page limitation of the Court is necessary;

(2) Plaintiffs' are required to address Defendants' new policies as well as their old policies, with qualifications as to how their Complaint addresses those new policies, and why challenges to the original polices are not mooted by Defendants' amendments;

(3) Defendants' have raised a new and novel legal issue, in asserting that Ohioans' homes are "closely regulated industries," for the purposes of Fourth Amendment analysis;

and

(4) Plaintiffs are at this point compelled to raise and explain their unjust enrichment claim, along with supporting evidence.

A proposed entry is being tendered herewith.

Respectfully submitted,

/s/ Maurice A. Thompson

Maurice A. Thompson (0078548)
1851 Center for Constitutional Law
208 E. State Street
Columbus, Ohio 43215
Tel: (614) 340-9817
Fax: (614) 365-9564
MThompson@OhioConstitution.org
Counsel of Record for Plaintiffs

Justin C. Walker (0080001)
Finney Law Firm, LLC
4270 Ivy Pointe Boulevard, Suite 225
Cincinnati, Ohio 45245
Tel: (513) 943-6660
Fax: (513) 943-6669
justin@finneylawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion has been served upon the Defendants through email to Portsmouth Counsel John Hust, on November 13, 2014.

/s/ Maurice A. Thompson